




Re: Questions   
Kim Hintz to: Randall Luthi

10/29/2009 01:45 PM

Mr. Luthi,

The primary post-Government employment restriction is 18 USC 207. These restrictions do not ban you from accepting employment with any private or public employer after leaving government service. Section 207 only prohibits individuals from engaging in certain activities on behalf of another. In other words, the statute does not limit who you work for, but it may limit what you do for them.

Section 207(a) will restrict your representational activities. Section 207(a) imposes a lifetime bar that prohibits you from knowingly making, with the intent to influence, any communication to or even appearance before an employee of the US on behalf of someone else in connection with a particular matter involving specific party in which you participated personally and substantially as a Government officer and in which the United States has a direct and substantial interest. This does not prohibit behind-the-scenes assistance. In your situation, you may sit on the review panel and provide advice and counsel to Taylor Energy. You may provide all of the behind-the-scenes assistance that is needed. You just cannot represent Taylor Energy back to the Department or the US Government to include meetings or signing documents that may be submitted on behalf of Taylor Energy.

If you have any additional questions, please send me an email or give me a call.

Thanks,  
Kimberly Hintz  
Deputy Director, Departmental Ethics Office  
Phone: (202)208-2151  
Fax: (202)208-5515

Mail: Department of the Interior  
Departmental Ethics Office  
1849 C Street NW  
MS 4258  
Washington DC 20240

"Randall Luthi"	Good morning Kim. As you might recall, I am the...	10/27/2009 12:42:30 PM
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From: "Randall Luthi"  
To: <kim\_hintz@ios.doi.gov>  
Date: 10/27/2009 12:42 PM  
Subject: Questions

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Good morning Kim. As you might recall, I am the former Director of MMS. I will be returning to Washington, DC in the capacity of President of the National Oceans Industry Association, but that won't occur until March of 2010. However, I have been contacted by a law firm representing Taylor Energy, which is involved in discussions with the Minerals Management Service concerning the clean up and abandonment of an underwater well site in the Gulf of Mexico.

They have asked if I would sit on a review panel to provide consultation advice on Taylor Energy's departure request that may be submitted to MMS in the future. I will not be appearing before either MMS or the Department of the Interior and will be working, to my knowledge, only with Taylor Energy and its

agents.

As Director of MMS I knew of the clean up plan and negotiations between MMS and Taylor Energy. I was not aware of the Departure Request, probably because it had never been discussed, or considered by Taylor Energy, or submitted while I was at MMS.

Thank you for your assistance upon my departure last January. And, thank you for your assistance in this matter.

Randall Luthi



Kim Hintz/PEL/OS/DOI  
01/08/2009 12:03 PM

To Randall Luthi/MMS/DOI  
cc  
bcc  
Subject Ethics Exit Briefing

Sir,,

I am meeting with you this afternoon concerning your ethics exit briefing. To be of assistance, I have attached a draft termination report for you to review. I used the report that you submitted last year as a template. If there are any changes, you can let me know and I will update your form.

Also, I have attached a summary of the post-government employment rules. We can go over any questions that you may have this afternoon.



LuthiTerm278.xls Summary of the Post-Employment Restrictions.mcd6final.doc

Thanks,  
Kimberly Hintz  
Deputy Director, Departmental Ethics Office  
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2 Jan 2009  
Met w/ Mr. Sethe - we talked  
about post-employed restrictions. He  
is going back to Wyoming may be  
Dean of Law School @ Univ of Wyoming  
& already has a disqual in place.  
He will be going back to his  
law firm. Doesn't believe that his  
"clients" would pose a conflict. But  
I told him that he could call  
us soon after he leaves.  
Kim Hintz